1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 10 CASE NO. 2:20-CV-01775-RSL PHYLLIS HARVEY-BUSCHEL, an 11 individual, STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE 12 Plaintiff, v. 13 UNIVERSITY OF WASHINGTON, 14 15 Defendant. 16 **STIPULATION** 17 18 Whereas, on September 16, 2021, Plaintiff requested a deposition date for University of 19 Washington witness Mindy Kornberg; Whereas, on September 22, 2021, Defendant informed Plaintiff that Ms. Kornberg was 20 21 available on December 1, 2021, a date before the December 5, 2021 discovery cut-off deadline, for her deposition; 22 Whereas on September 23, 2021, Defendant informed Plaintiff that Ms. Kornberg was 23 actually unavailable for her deposition from November 22 to December 3, 2021; 24 25 Whereas, lead defense counsel was unavailable in November due to a four-week jury trial in another matter; 26

## Case 2:20-cv-01775-RSL Document 33 Filed 12/07/21 Page 2 of 3

Whereas, on October 25, 2021, Defendant proposed December 10, 2021, a date after the 1 2 discovery cut off, to conduct Ms. Kornberg's deposition; and 3 Whereas, on November 8, 2021, Plaintiff noted the deposition for Mindy Kornberg to occur on December 10, 2021. THE PARTIES HEREBY AGREE AND REQUEST the Court's permission to allow the 5 deposition of Ms. Kornberg to occur on December 10, 2021 after the discovery cut-off deadline. 6 7 MBE LAW GROUP PLLC SUMMIT LAW GROUP, PLLC 8 9 By: *s/Margaret Pak Enslow (with permission)* By: s/Seth J. Berntsen Lisa A. Burke. WSBA #42859 Seth J. Berntsen, WSBA #30379 10 Margaret Pak Enslow, WSBA #38982 Hathaway Burden, WSBA #52970 SUMMIT LAW GROUP, PLLC MBE LAW GROUP PLLC 11 1700 Seventh Avenue, Suite 2100 315 Fifth Avenue S., Suite 1000 Seattle, WA 98101 Seattle, WA 98104 12 (206) 400-7722 (206) 676-7000 13 lburke@mbelg.com SethB@summitlaw.com HathawayB@summitlaw.com margaret@mbelg.com 14 Attorneys for Plaintiff Attorneys for Defendant 15 16 17 18 19 20 21 22 23 24 25 26

**ORDER** Based on the foregoing Stipulation of the Parties, it is hereby ORDERED that the deposition of Mindy Kornberg may be taken after the discovery cut-off for good cause shown herein. IT IS SO ORDERED Dated this 7th day of December, 2021. MMS Casnik ROBERT S. LASNIK United States District Court Judge